

Exhibit B

7/28/2015

BMG Rights Management, et al. v. Cox Enterprises, Inc., et al.
Highly Confidential

Roger Vredenburg

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

BMG RIGHTS MANAGEMENT :
(US) LLC, and ROUND HILL :
MUSIC LP, :
:
Plaintiffs, : Case No.
vs. : 1:14-cv-1611
:
COX ENTERPRISES, INC., :
COX COMMUNICATIONS, INC., :
COXCOM, LLC, :
:
Defendants. :
:
:

*** HIGHLY CONFIDENTIAL ***

VIDEOTAPED DEPOSITION OF ROGER VREDENBURG

Tuesday, July 28, 2015

Virginia Beach, Virginia

9:25 a.m.

Reported by: Susan Ashe, RMR, CRR

DIGITAL EVIDENCE GROUP
1726 M Street NW, Suite 1010
Washington, DC 20036
(202) 232-0646

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1 Atlanta in the security group?

2 MR. BUCKLEY: Objection. Requires
3 him to speculate.

4 A. No.

5 Q. Do you know who Randy reports to?

6 A. No.

7 Q. Do you know the location of the person
8 that Randy reports to?

9 A. I would assume he's in the same building,
10 Hampton Roads.

11 Q. Does your group in Hampton Roads -- when
12 you say "Hampton Roads," we're talking about the
13 same place?

14 A. Correct.

15 Q. The place where you work?

16 A. Correct.

17 Q. Do they report to the Atlanta -- the
18 security group in Atlanta?

19 MR. BUCKLEY: Object to the form.

20 A. The four of us report to Atlanta.

21 Q. When you say "the four of us," the four
22 reps?

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1 A. Correct.

2 Q. You report to Atlanta through Kim Brown
3 and Randy Bogart?

4 Is that what you mean?

5 A. Yes.

6 Kim is our immediate supervisor.

7 But we don't have to actually go through
8 her all the time when we're working with Atlanta.

9 We can do it via e-mail, phone, or
10 anything of that nature if we have issues.

11 Q. And who in Atlanta would you contact if
12 you had issues?

13 MR. BUCKLEY: Object to the form.
14 Lacks foundation. Vague and ambiguous.

15 A. Jason Zabek, Joe Sikes. Those are two
16 that we actually report to.

17 There's others --

18 I'm sorry, go ahead.

19 Q. I didn't want to cut you off.

20 A. I was going to say: There's others that
21 work there, but those are the two prime ones that we
22 actually try to work through.

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1 equals reactivate.

2 Do you see that?

3 A. Yes.

4 Q. And then he writes a short while later --
5 a minute later: You can make him wait a day or so
6 if you want. Smiley face.

7 Do you see that?

8 A. Yes.

9 Q. And then you wrote back: Wish we could
10 send this to every customer. And you attach a link
11 to a website.

12 Do you see that?

13 A. Yes.

14 Q. Do you remember what this website was?

15 A. No. It looks like some kind of a news
16 story to me.

17 Q. Is Jason Zabek instructing you to
18 reactivate this subscriber?

19 MR. BUCKLEY: Objection. It requires
20 him to speculate.

21 A. I would assume that's what he's saying.

22 Yes.

DEPOSITION ERRATA SHEET

Deposition of: Roger Vredenburg Date of Deposition: July 28, 2015
Case Name: BMG Rights Management, et al. v. Cox Enterprises, et al.
Case Number: 1:14-cv-1611-LOG/JFA
Reporter: Susan Ashe

Please make all corrections, changes or clarifications to your testimony, showing page and line numbers. If there are no changes, write "none" across this page. Sign and date on the lines provided.

Page No.	Line No.	Change From	Change To	Reason
11	12	to	two	NUMBER
13	18	buyers	viruses	WRONG WORD
13	19	D-BS	DDOS	WRONG WORD
14	11	intake	take	WRONG WORD
97	14	.5	2.5	WRONG NUMBER
101	5	PORT	UNKNOWN AS TO WHAT THIS IS	
154	18	work done	worked on	WRONG WORDS
203	5	views	VUZE	WRONG WORD
215	21	submit	suppose	WRONG WORD
22	8	PACP	DHCP	WRONG WORD

Signature: Roger Vredenburg
Roger Vredenburg

Date: 8/17/18

Date: 8/17/15